

1 **WEIL, GOTSHAL & MANGES LLP**  
2 Stephen Karotkin (*pro hac vice*)  
(stephen.karotkin@weil.com)  
3 Ray C. Schrock, P.C. (*pro hac vice*)  
(ray.schrock@weil.com)  
4 Jessica Liou (*pro hac vice*)  
(jessica.liou@weil.com)  
5 Matthew Goren (*pro hac vice*)  
(matthew.goren@weil.com)  
6 New York, NY 10153-0119  
7 Tel: (212) 310-8000  
Fax: (212) 310-8007

8 **KELLER BENVENUTTI KIM LLP**  
9 Tobias S. Keller (#151445)  
(tkeller@kbkllp.com)  
Jane Kim (#298192)  
(jkim@kbkllp.com)  
10 650 California Street, Suite 1900  
San Francisco, CA 94108  
11 Tel: (415) 496-6723  
Fax: (415) 636-9251

12 *Attorneys for Debtors and Debtors in Possession*

13  
14 **UNITED STATES BANKRUPTCY COURT**  
15 **NORTHERN DISTRICT OF CALIFORNIA**  
16 **SAN FRANCISCO DIVISION**

17 **In re:**

18 **PG&E CORPORATION,**

19 **- and -**

20 **PACIFIC GAS AND ELECTRIC  
COMPANY,**

21 **Debtors.**

22  Affects PG&E Corporation  
23  Affects Pacific Gas and Electric Company  
24  Affects both Debtors

25 \* *All papers shall be filed in the lead case,  
No. 19-30088 (DM)*

26 Bankruptcy Case No. 19-30088 (DM)  
Chapter 11  
(Lead Case)  
(Jointly Administered)

27 **STIPULATION BETWEEN THE  
DEBTORS AND THE CALIFORNIA  
PUBLIC UTILITIES COMMISSION  
EXTENDING TIME TO FILE MOTION  
PURSUANT TO FED. R. BANKR. P.  
3018(a) AND AMENDING AMENDED  
ORDER ESTABLISHING SCHEDULE  
FOR DISCLOSURE STATEMENT  
APPROVAL AND PLAN  
CONFIRMATION**

28 Re: Dkt. No. 5732

[No Hearing Requested]

1        This stipulation and agreement for order (“**Stipulation and Agreement for Order**”) is  
2 entered into by PG&E Corporation and Pacific Gas and Electric Company, as debtors and  
3 debtors in possession (collectively, the “**Debtors**”) in the above-captioned chapter 11 cases (the  
4 “**Chapter 11 Cases**”), and the California Public Utilities Commission (the “**Commission**”). The  
5 Debtors and the Commission are referred to in this Stipulation and Agreement for Order  
6 collectively as the “**Parties**,” and each as a “**Party**.” The Parties hereby stipulate and agree as  
7 follows:

## RECITALS

9           A.       On February 11, 2020, the United States Bankruptcy Court for the Northern  
10          District of California (the “**Bankruptcy Court**”) entered the *Amended Order Establishing*  
11          *Schedule for Disclosure Statement Approval and Plan Confirmation* [Docket No. 5732] (the  
12          “**Scheduling Order**”)<sup>1</sup>, which, among other things, scheduled the deadline for any creditor to  
13          file a motion pursuant to Bankruptcy Rule 3018(a) seeking to temporarily allow its Claim or  
14          Interest in a different amount for purposes of voting to accept or reject the Plan as March 6,  
15          2020, at 4:00 p.m. (Prevailing Pacific Time).

16           B.       Counsel for the Commission has requested, and counsel for the Debtors has  
17       agreed, that the time for the Commission to file a motion pursuant to Bankruptcy Rule 3018(a)  
18       be extended.

19 NOW, THEREFORE, UPON THE FOREGOING RECITALS, WHICH ARE  
20 INCORPORATED AS THOUGH FULLY SET FORTH HEREIN, IT HEREBY IS  
21 STIPULATED AND AGREED, BY AND BETWEEN THE PARTIES, THROUGH THE  
UNDERSIGNED, AND THE PARTIES JOINTLY REQUEST THE COURT TO ORDER,  
THAT:

22 1. The time for the Commission to file and serve a motion pursuant to Bankruptcy  
23 Rule 3018(a) is extended through 4:00 p.m. (Prevailing Pacific Time) on March 20, 2020.

<sup>1</sup> Capitalized terms used but not otherwise herein defined have the meanings ascribed to such terms in the Scheduling Order.

2. Except as expressly set forth herein, all other provisions of the Scheduling Order shall remain in full force and effect and shall not be impacted by this Stipulation.

3. This Stipulation shall constitute the entire agreement and understanding of the parties relating to the subject matter hereof and shall supersede all prior agreements and understandings relating to the subject matter hereof.

4. This Stipulation may be executed in counterparts, each of which shall be deemed an original but all of which together shall constitute one and the same agreement.

5. The Bankruptcy Court shall retain jurisdiction to resolve any disputes or controversies arising from this Stipulation.

[Signature on Next Page]

Dated: March 6, 2020

WEIL, GOTSHAL & MANGES LLP  
KELLER BENVENUTTI KIM LLP

By: /s/ Dara L. Silveira  
Dara L. Silveira

*Attorneys for Debtors  
and Debtors in Possession*

Dated: March 6, 2020

CALIFORNIA PUBLIC  
UTILITIES COMMISSION

Arocles Aguilar, SBN 94753  
Geoffrey Dryvynsyde, SBN 139884  
Candace Morey, SBN 233081  
505 Van Ness Avenue  
San Francisco, California 94102  
Telephone: (415) 703-2015  
Facsimile: (415) 703-2262  
Email: arocles.aguilar@cpuc.ca.gov  
geoffrey.dryvynsyde@cpuc.ca.gov  
candace.morey@cpuc.ca.gov

-and-

PAUL, WEISS, RIFKIND,  
WHARTON & GARRISON LLP

By: /s/ Alan W. Kornberg  
Alan W. Kornberg  
Brian S. Hermann (*pro hac vice*)  
Walter Rieman, SBN 139365  
Sean A. Mitchell (*pro hac vice*)  
1285 Avenue of the Americas  
New York, New York 10019-6064  
Telephone: (212) 373-3000  
Facsimile: (212) 757-3990  
Email: akornberg@paulweiss.com  
bhermann@paulweiss.com  
wrieman@paulweiss.com  
smitchell@paulweiss.com

*Attorneys for the California Public  
Utilities Commission*